

1 Amy H. Rubin
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6 Attorneys for the Defendant

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON
9 The Honorable THOMAS O. RICE

10 United States of America,

11 Plaintiff,

12 v.

13 DAVID BISHOP,

14 Defendant.

No. 2:17-CR-0182-TOR

Motion to Continue Sentencing

Spokane - Without Oral Argument

November 22, 2019 @ 6:30 p.m.

25 Motion to Continue Sentencing

1 David Bishop, through counsel, Amy H. Rubin for the Federal Defenders of
2 Eastern Washington and Idaho, respectfully moves the Court to continue Mr. Bishop's
3 sentencing hearing from the date currently scheduled for December 3, 2019 to a late
4 February setting.

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6 The Indictment was filed on October 17, 2017. On October 31, 2017, Mr. Bishop
7 appeared for his arraignment and was released under pretrial conditions. On September
8 20, 2018, Mr. Bishop entered a plea of guilty to Count 2 of the Indictment and sentencing
9 is currently scheduled for December 3, 2019.

10 Mr. Bishop was released on strict conditions of release and is currently in complete
11 compliance with his release conditions.

12 REQUEST FOR CONTINUANCE

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14 Counsel for Mr. Bishop respectfully requests additional time for Mr. Bishop to
15 address medical issues and attend currently scheduled medical appointments in Bellevue,
16 WA.

17 Counsel for Mr. Bishop believes this information may be necessary for counsel to
18 provide to the Court for sentencing. Thus, counsel requests more time to adequately
19 prepare for sentencing as this information may have an effect on Mr. Bishop's sentencing.

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21
22 Motion to Continue Sentencing

Assistant United States Attorney, Patrick J. Cashman was contacted regarding this request and has no objection to the request.

CONCLUSION

Based on the foregoing, Mr. Bishop respectfully requests this matter be continued. In an effort to assist the Court with scheduling, counsel respectfully requests a sentencing date in February. Lastly, Mr. Bishop does not request a hearing on the matter unless this Court deems it necessary to have a hearing.

Dated: November 22, 2019

Respectfully Submitted,

S/Amy H. Rubin

Amy H. Rubin, GA 618349

Attorneys for Bishop

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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: PATRICK CASHMAN, Assistant United States Attorney.

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